

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,

Plaintiff,

1:19-CV-03377

ECF CASE

-against-

**FIRST SUPPLEMENTAL
DECLARATION OF
ALAN DERSHOWITZ**

ALAN DERSHOWITZ

Defendant,
-----X

I, ALAN DERSHOWITZ, declare under penalty of perjury that the foregoing is true and correct, pursuant to 28 U.S.C. § 1746, as follows:

1. I am the Defendant in this case, and I am familiar with the facts and circumstances in this matter based upon my own personal knowledge and observations, review of documents within my possession, and those matters not based thereon are upon information and belief.

2. I respectfully submit this Supplemental Declaration in further support of my Motion to Disqualify and in response to the affidavits of Sarah Ransome and Maria Farmer filed in support of the Plaintiff's Complaint.

Sarah Ransome

3. Shortly after Sarah Ransome falsely accused me of having sexual contact with her when she was 22-years-old, a lawyer named Laura Menninger sent me a large stack of emails sent by Sarah Ransome to a New York Post journalist named Maureen Callahan.

4. Menninger sent them to me because my name had been placed on a witness list in the lawsuit between Virginia Giuffre and Ghislaine Maxwell. Although the emails

had been sent to the Post reporter for the purpose of having them published, and were not subject to any claims of privilege or privacy, they were sealed and/or placed under a protective order.

5. On February 9, 2018, just before 2:00 p.m., I received a phone call from Maureen Callahan. I had previously contacted her about another story, and after discussing that story, I asked her if she remembered a woman named Sarah Ransome. She stated that she did remember getting emails and calls from Ransome in which Ransome asked her to publish accusations against Hillary Clinton, Bill Clinton, Donald Trump and Richard Branson.

6. Callahan told me that Ransome had told her that she had sex tapes of Hillary Clinton, Bill Clinton, Donald Trump and Richard Branson. Callahan then said she asked Ransome for the videos and any other evidence, but Ransome refused to provide any video tapes or corroborating evidence to back-up her claims. She also refused to provide any corroborating evidence to back-up her sexual allegations against other prominent people.

7. Callahan, of course, refused to publish her accusations, saying that they were too "fantastic" and "not credible" and that Ransome herself did not seem like a credible person. Callahan told me that the New York Post would never publish these kinds of accusations based on such unfounded allegations.

8. I asked Callahan if any of the conversations or emails to her were privileged or confidential. Callahan said absolutely not, because Ransome wanted her to publish everything she had sent her and nothing was off the record.

9. Callahan then asked me why I was interested in Ransome and I told her that Ransome had falsely accused me, Callahan responded "Why would she do that? She never

accused you when she spoke or wrote to me. She accused other well-known people but she never accused you.”

10. This information from Callahan is just the tip of a very deep iceberg. While I do not feel comfortable disclosing the specific contents of Ransome’s numerous emails, I can say that anyone reading them would never believe anything she ever said about anyone.

11. The New York Post appropriately decided that Ransome was not sufficiently credible to meet the standards of Page Six. Yet, David Boies, Sigrid McCawley, and likely other Boies Firm attorneys, who are fully aware of these emails and their content, submitted an affidavit by Ransome accusing me of serious misconduct and vouching for her credibility. In submitting this affidavit, neither Boies, McCawley, nor any Boies Firm attorneys, disclosed that evidence existed that raised grave doubts about the credibility of the affiant.

Maria Farmer

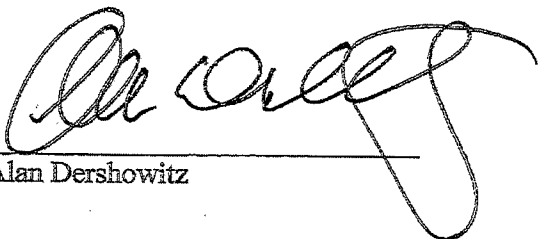
12. Maria Farmer has filed an affidavit in which she falsely claims that she saw me walking up the steps of Jeffrey Epstein’s house with young women. Not only is that claim absolutely and categorically false, it is provably false by the indisputable chronology.

13. Farmer terminated any relationship she had with Epstein during the summer of 1996, when she was working for Leslie Wexner in Ohio and claims to have been assaulted by Epstein. I did not even meet Epstein until after Farmer terminated her relationship with him.

14. I was never in Epstein’s New York house until after Farmer was no longer in the house. There is no possible way that Farmer could have ever seen me in Epstein’s

house. Nor is there any possible way she could have seen me in the presence of Jeffrey Epstein with any underage females, because no such event ever occurred.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, and that this declaration was executed in New York, New York, on the 9th day of July, 2019.



Alan Dershowitz